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RICHARD L. CHANG

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

Richard L. Chang,

Plaintiff;

v.

Biosuccess Biotech Co. Ltd., et al.

Defendants.

Biosuccess Biotech, Co. Ltd.,

Counterclaimant,

v.

Richard L. Chang et al.,

Counterclaim Defendants.

Case No. CV13-01340 JAK (ANx)

DECLARATION OF CHRISTOPHER SARGENT IN SUPPORT OF PLAINTIFF RICHARD L. CHANG'S MOTIONS *IN LIMINE* NUMBERS 1 TO 7

Judge: Hon. John A. Kronstadt
Place: Courtroom 750
Date: June 2, 2014
Time: 3:00 p.m.

Trial: June 17, 2014

Entrepreneur Law Group LLP

I, Christopher Sargent, declare under penalty of perjury as follows:

1. I am an attorney admitted to practice before this Court, and I am a partner at the law firm of Entrepreneur Law Group LLP, counsel for Plaintiff Richard L. Chang in this matter. I have personal knowledge of the facts set forth in this declaration, and if called to do so I could and would testify competently to the same. I make the statements here of my own personal knowledge, except where stated on information and belief, which statements I believe to be true, and if called to do so, I could and would testify competently to those matters stated here.

2. Attached as **Exhibit 1** is a true and correct copy of the Expert Report of Larry Stewart served by Defendants.

3. Attached as **Exhibit 2** is a true and correct copy of the Expert Report of Valery Aginsky, Ph.D.

4. Attached as **Exhibit 3** is a true and correct copy of a printout from Lexis-Nexis of the decision in Ceglia v. Zuckerberg, 2013 U.S. Dist. LEXIS 45500 (W.D.N.Y. Mar. 26, 2013).

5. Attached as **Exhibit 4** is a true and correct copy of selected pages of the deposition of Fred Wu.

6. Attached as **Exhibit 5** is a true and correct copy of selected pages of the deposition of Zheng Tao Han.

I declare under penalty of perjury that the foregoing are true and correct of my personal knowledge, and that this Declaration was entered into on this 5th day of May 2014 in Palo Alto, California.

/s/ Christopher Sargent
Christopher Sargent

Entrepreneur Law Group LLP